

Request for Reconsideration

Applicants thank the Examiner for his careful consideration of this application and for the helpful (brief) telephone discussion on February 2, 2006. Applicants note that, during this telephone discussion, the Examiner was asked about, and clarified, his interpretation of "substrate" for the purposes of Claim 26 and its dependent claims. This will be revisited below.

Applicants acknowledge, with gratitude, the allowance of Claims 1-5, 8-14, and 38-40, as well as the indication of allowable subject matter in Claim 32. Applicants, however, respectfully request reconsideration of this application, particularly, the remaining rejected claims (Claims 26, 27, 29-31, and 33) in view of the following remarks.

To recap the current claim status, Claims 1-5, 8-14, 26, 27, 29-33, and 38-40 remain pending in the application, with Claims 1, 9, 26, and 38 being the independent claims.

At Pages 2-3, the Office Action rejects Claims 26, 27, 29, 31, and 33 under 35 U.S.C. § 102(e) as being anticipated by Iwata et al. (U.S. Patent No. 6,876,055). At Pages 3-4, the Office Action rejects Claim 30 under 35 U.S.C. § 103(a) as being unpatentable over Iwata et al. in view of Wong et al. (U.S. Patent No. 6,246,094). Applicants respectfully traverse these rejections for the following reasons.

During the above-mentioned telephone discussion, the Examiner clarified that he was understanding the term, "substrate," in a broad fashion, to include layer 312 of Fig. 17 of Iwata et al., as well as the underlying region 311.

First, col. 2, line 7 of Iwata et al. specifies that reference numeral 311 refers to "a P-type semiconductor substrate" in Fig. 17. No other region is referred to as being part of the substrate of Fig. 17. In particular, reference numeral 312 is stated, in col. 2, lines 7-8, as referring to "an N-type deep well region." Therefore, the Office Action's interpretation of "substrate" would appear to be at odds with the teachings of the Iwata et al. patent.

Second, the word, "substrate," has a specific meaning in the art. Applicants are providing, as exhibits showing the art-recognized usage of "substrate," portions of textbooks by J. Millman and by B.G. Streetman, as well as an entry from Wikipedia, a web-based encyclopedia. As shown and discussed in these exhibits, "substrate" is used in the art of semiconductor devices to refer to the material on which a device is formed. In view of this, it is further submitted that the Office Action's interpretation of "substrate" is at odds with the art-recognized usage of "substrate."

In view of the fact that the Office Action appears to have assumed too broad of an interpretation of "substrate," Applicants respectfully request that the arguments found in their previous Amendment and Reply, filed on November 4, 2005, be reconsidered with respect to Claims 26, 27, 29-31, and 33. In particular, Applicants maintain that the structure shown in Fig. 17 of Iwata et al. does not meet all of the limitations of Claim 26 and, therefore, that Claims 26, 27, 29-31, and 33 are allowable over the applied prior art, and furthermore, that the objection to Claim 32 should be withdrawn.

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While Applicants do not necessarily concur with the Office Action's characterizations of the claims and/or the references with regard to other claimed features, Applicants choose not to discuss each such feature. Consequently, the lack of explicit discussion is not to be understood as indicating tacit agreement with such characterizations.

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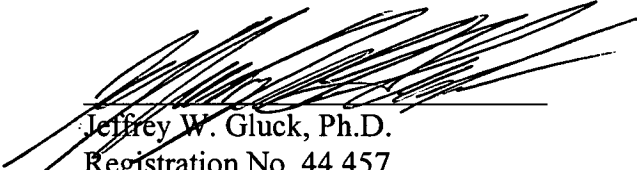
Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Request for Reconsideration is respectfully requested.

Respectfully submitted,

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Jeffrey W. Gluck, Ph.D.
Registration No. 44,457
VENABLE LLP
P.O. Box 34385
Washington, D.C. 20043-9998
Telephone: (202) 344-4000
Direct Dial: (202) 344-8017
Telefax: (202) 344-8300

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